
Electronic Mail and U.S. Mail

October 7, 2020

Ms. Deborah Aja
Western District Supervisor
Solid Waste Section Field Operations Branch
Asheville Regional Office
2090 US 70 Highway
Swannanoa, NC 28778-8211

Re: American Zinc Products, LLC (“AZP”)
Mooresboro facility, Rutherford County, North Carolina

Dear Ms. Aja:

In the course of conducting an internal environmental audit last week with respect to the industrial byproduct gypsum at AZP’s Mooresboro, North Carolina facility, we discovered that shipments of gypsum were inadvertently sent to Waste Connections, in Polkton, North Carolina on September 21 and 22 prior to our receipt of TCLP test results for those loads. The analysis of this gypsum initially indicated that it exceeded TCLP testing for cadmium, with a result of 1.1 mg/l. The TCLP threshold for cadmium is 1.0 mg/l. Repeat testing on the same sample confirmed this result on October 5, 2020.

AZP’s Mooresboro facility produces special high-grade zinc for use in the galvanizing industry. The facility produces gypsum through lime precipitation during the treatment of raffinate bleed solution to control pH and sulfate levels and remove trace metals during the hydro-metallurgical production of zinc metal. As you may know, AZP only recently resumed operations of this facility after facility-wide technology upgrades and process modifications. With minimal history for the gypsum produced at the re-engineered facility, AZP developed and maintains a protocol for testing and appropriate management of this gypsum byproduct that includes TCLP testing prior to any beneficial reuse or disposal.

During this calendar year and until September 20th, all of the gypsum byproduct has tested well below TCLP limits for non-hazardous waste disposal. The result from a composite sample collected on September 20th of material produced from September 17th through September 20th was believed to be an anomaly since the TCLP results for cadmium were twice any of the previous results since February 2020. Thus, we

requested the laboratory perform a confirmatory analysis of the same September 20th sample aliquot. Notwithstanding the sampling protocol, the materials from which the sample was collected was mistakenly loaded and shipped prior to receiving analytical results, and is the only occurrence of which we are aware where disposal has occurred deviating from our internal protocol.

The impacted landfill has been notified by telephone and this is confirmation of our call to your office on behalf of AZP. A table containing information on shipments of the material made to the landfill on September 21st and 22nd is attached.

We are fully committed to compliance with all applicable laws and diligently correcting any non-compliance issues. We will cooperate fully with the Department in any investigation of this matter and seek your assistance in determining any additional steps that need to be taken. We request that the Department consider this letter a voluntary disclosure pursuant to North Carolina General Statutes Annotated § 8-58.61. I look forward to working with you to ensure our full compliance with the applicable regulations.

If you have any questions, please contact me at 724-773-2223.

Sincerely,

A handwritten signature in cursive script, reading "Timothy R. Basilone".

Timothy R. Basilone

TRB/

Cc: Jason Watkin, NCDEQ, by electronic mail only

Enclosures – Table of shipments and lab results

Shipments Made September 21 and 22, 2020 to Waste Connections Landfill

Date Shipped	Customer	Destination	Bill of Lading #	Net Weight TONS
9/21/2020	Waste Connections	Polkton,NC	41761	29.73
9/21/2020	Waste Connections	Polkton,NC	41762	23.14
9/21/2020	Waste Connections	Polkton,NC	41763	24.89
9/21/2020	Waste Connections	Polkton,NC	41764	25.61
9/21/2020	Waste Connections	Polkton,NC	41765	24.07
9/21/2020	Waste Connections	Polkton,NC	41766	23.6
9/21/2020	Waste Connections	Polkton,NC	41767	21.62
9/21/2020	Waste Connections	Polkton,NC	41768	23.46
9/21/2020	Waste Connections	Polkton,NC	41769	22.42
9/21/2020	Waste Connections	Polkton,NC	41770	23.87
9/21/2020	Waste Connections	Polkton,NC	41771	22.01
9/21/2020	Waste Connections	Polkton,NC	41772	21.41
9/21/2020	Waste Connections	Polkton,NC	41773	25.87
9/21/2020	Waste Connections	Polkton,NC	41774	22.46
9/21/2020	Waste Connections	Polkton,NC	41775	23.24
9/21/2020	Waste Connections	Polkton,NC	41776	25.99
9/22/2020	Waste Connections	Polkton,NC	41777	22.25
9/22/2020	Waste Connections	Polkton,NC	41778	22.67
9/22/2020	Waste Connections	Polkton,NC	41779	22.49
9/22/2020	Waste Connections	Polkton,NC	41780	22.49
9/22/2020	Waste Connections	Polkton,NC	41781	21.89
9/22/2020	Waste Connections	Polkton,NC	41782	24.45
9/22/2020	Waste Connections	Polkton,NC	41783	20.74
9/22/2020	Waste Connections	Polkton,NC	41784	22.33
9/22/2020	Waste Connections	Polkton,NC	41785	23.34
9/22/2020	Waste Connections	Polkton,NC	41786	21.19
9/22/2020	Waste Connections	Polkton,NC	41787	23.99